

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES,

Plaintiff,

v.

BERNARD KLEIN,

Defendant.

Case No. 1:20-cr-00062-WES-LDA

**DEFENDANT’S CONSENT MOTION FOR AN EXTENSION OF TIME  
TO FILE BRIEF ON RESTITUTION**

Defendant Bernard Klein (“Klein”) hereby submits this Consent Motion for an Extension of Time to File Brief on Restitution and in support state as follows.

The Court issued its Judgment in this case on April 13, 2021. Dkt. 47. At that time, the Court deferred the determination of restitution to be imposed. *Id.* at 6.

In the ensuing months, the parties filed three Unopposed Motions to Continue the Restitution Hearing, which the Court granted. Dkts. 52-54.

On August 16, 2021, the Government filed a Motion for Entry of a Restitution Order, which Defendant opposed. Dkt. 57. In its Motion, the Government expressed the parties’ joint request for a scheduling conference to set an appropriate briefing schedule on the matter of restitution. *Id.* at 2. The Court held the scheduling conference on September 1, 2021, and ordered Defendant to submit a brief on restitution by October 15, 2021.

The issues that Defendant intends to raise in the brief on restitution are uncommon, focusing on the restitution that is appropriate in light of the specific offense to which Defendant pleaded guilty. To deliver a brief that sets forth these issues in the manner most helpful to the

Court, Defendant seeks a 30-day extension of the deadline to file the brief on restitution, from October 15, 2021, to November 15, 2021.

AUSA Sandra Hebert has represented that the government consents to the extension of time as requested. Furthermore, a 30-day extension would not result in prejudice to opposing counsel or disrupt the Court's schedule.

DATED: October 14, 2021

Respectfully Submitted,

/s/ James M. Trusty

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*Counsel for Defendant Bernard Klein*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 14, 2021, I served the above Motion for an Extension of Time using the Court's electronic filing system.

Respectfully submitted,

/s/ James M. Trusty  
James M. Trusty  
*Counsel for Defendant Bernard Klein*